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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Ben Nighthorse Campbell
United States Senate
717 Hart Senate Office Building
Washington, D.C. 20510

Dear Senator Campbell:

This is in reply to your letter of June 29, 1993, in which you inquired on behalf of your constituent, Mr. A. Lewis Dahm, regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

The proposals in the Notice reflect to a large extent concepts and proposals submitted in the initial inquiry stages of this proceeding. None of the proposals set forth in the Notice, however, are engraved in stone. Indeed, the proposals represent our best judgment at this stage of the proceeding on steps that must be taken to improve the regulatory climate for users of the private land mobile radio spectrum below 512 MHz. I have enclosed for your information a copy of that part of the Notice that describes the numerous proposals, plus a discussion paper released March 1, 1993.

We are sensitive to the needs of users of private land mobile radio spectrum and the impact that these proposals may have on their radio systems. We will endeavour to protect all private land mobile radio systems, including those operated by public safety entities. Your constituent's letter will be included in the record of this proceeding and will be fully evaluated when we develop final rules.

Thank you for your interest in this proceeding. We expect to issue final rules in 1994.

Sincerely,

Edward R. Jacobs

Edward R. Jacobs
Deputy Chief, Land Mobile and
Microwave Division

Enclosures

No. of Copies rec'd
List ABCDE

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92-236
275
United States Senate

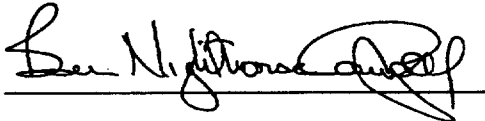
WASHINGTON, D.C.

June 29, 1993

The attached communication is submitted for your consideration, and to ask that the request made therein be complied with, if possible.

If you will advise me of your action in this matter and have the letter returned to me with your reply, I will appreciate it.

Very Truly Yours,



Ben Nighthorse Campbell
U.S. Senator

State of Colorado

ROCKY MOUNTAIN RESCUE GROUP, INC.
P. O. BOX Y
BOULDER, COLORADO 80306

May 27, 1993

The Honorable Ben Nighthorse Campbell, Senator
United States Senate
1129 Pennsylvania St.
Denver, CO 80203

Dear Senator Campbell:

We have been informed of proposed rulemaking by the Federal Communications Commission (FCC) that will have a major impact on our Mountain Rescue Team. This action is contained in Docket #92-235, a Notice of Proposed Rule Making issued last year by the FCC.

We are a 40 member all-volunteer Mountain Rescue Team, based in Boulder, Colorado, founded in 1947. We perform mountain search and rescue primarily in Boulder County, but we do respond several times a year to assist other Colorado teams, or to major mountaineering accidents where our skills are needed, even outside Colorado.

Briefly, the docket proposes spectrum re-framing for users in the Private Land Mobile Radio Service (PLMR). The PLMR radio service includes: Public Safety, Police, Special Emergency, Fire, Local Government, plus many more users. This docket would serve to create more available frequencies for users by requiring the utilization of new technology. The idea behind this docket has merit, but there are also some major concerns, detailed below:

1. This docket proposes that by 1996 all current radios must be modified to a 12 1/2 Khz channel spacing or be taken out of service. Then a second change would obsolete this within 10 years. The current spacing is 15 Khz. We have not found any commercially available radios that will operate at the 12 1/2 spacing without being adversely affected. We believe that the technology is not yet available to produce new radios with spacing of 12 1/2, much less to accomplish the modification of radios currently in use, especially at a reasonable cost. Additionally, a change from 15 to 12 1/2 would mean that 6 out of each 7 frequencies would have to be changed, at considerable expense for a 10 year investment. If the FCC is not

communications ability or make the cost beyond our capabilities.

3. The FCC seems to be proposing to eventually use the cellular or trunked systems technology which some large agencies have gone to in the higher frequencies. This may be ok in densely populated urban areas, but the cost could not be justified in sparsely populated rural areas.

4. There have not been any provisions for emergency rescue teams who must be able to operate effectively in various different areas of a state or in remote areas away from their normal base of operations.

5. We are a Not-for-profit Colorado Corporation that depends on private donations and some limited public funding by local agencies. The docket as it is proposed will cause us to need considerable additional funding to replace our current radios.

In conclusion we suggest that a portion of the VHF-HI band be left for agencies such as ours to use to communicate easily in different areas, due to the ability of VHF-HI band to work well in mountainous terrain